

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**MOTION FOR LATE ACCEPTANCE OF
REPLY OF THE UNITED STATES POSTAL SERVICE
TO DOUGLAS CARLSON MOTION TO COMPEL A RESPONSE TO DFC/USPS-4
(October 15, 1997)**

The United States Postal Service hereby moves for late acceptance of its reply to the September 29, 1997, motion of Douglas Carlson to compel a response to interrogatory DFC/USPS-4.

The reply to this motion was due to have been filed on October 9, 1997. From the moment of receipt of the motion (on or about September 2, 1997), undersigned counsel was consumed with the filing of responses to discovery, preparation of witnesses for hearings, motion practice related to Notice of Inquiry No.1, and participation in hearings from October 6 through 9.¹

From October 10 through October 14, 1997, counsel was out-of-town assisting with the care of an individual who underwent reconstructive knee surgery on October 10th, and returned to the office on the afternoon of October 14th. Accordingly, counsel was unable to prepare a reply to the motion until today.

Under the circumstances, counsel believes that late acceptance of the reply is in order.

¹ Like several other of his colleagues, averaging more than 12 hours of work each day.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

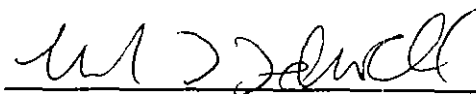
Daniel J. Foucheaux, Jr.
Chief Counsel, Rate making



Michael T. Tidwell

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Michael T. Tidwell

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October 15, 1997